

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
MICHAEL A. KEOUGH (NYRN 5199666)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6878  
Fax: (415) 436-7234  
[michael.keough@usdoj.gov](mailto:michael.keough@usdoj.gov)

*Attorneys for Defendant  
Merrick B. Garland*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BRAD D. BRINSON, an individual,  
Plaintiff,  
v.  
MERRICK B. GARLAND, et al.,  
Defendants. ) Case No. 3:22-CV-09076-JSC  
              )  
              )  
              ) **JOINT STIPULATION AND [PROPOSED]**  
              ) **ORDER REGARDING CASE MANAGEMENT**  
              ) **CONFERENCE**  
              )  
              )  
              )

Pursuant to Civil Local Rules 6-2(a) and 7-12, and subject to the Court’s approval, the Plaintiff and Defendants (collectively, the “Parties”) jointly request to modify the date for the Initial Case Management Conference, currently set for October 26, 2023, to Thursday, January 25, 2024.

The Parties request to modify the date of the Initial Case Management Conference in order to allow the Parties additional time to continue their good faith negotiations in an attempt to resolve this matter without judicial intervention. The request is for approximately ninety days in order to allow sufficient time to coordinate any potential resolution with the necessary parties at the relevant agencies. If the Parties are unable to reach a resolution prior to January 18, 2024, the Parties will submit a Case Management Conference Statement on that date with a proposed case schedule including dates for Plaintiff's amendment (if any) and discovery.

JOINT STIPULATION TO CONTINUE DATE OF CMC  
NO. 3:22-CV-09076-JSC

The Parties respectfully submit that allowing additional time to negotiate a resolution will conserve the resources of the parties and the Court, and promote the speedy resolution of this matter. This is the third joint request by all the parties to modify the date of a Case Management Conference in this case (*see* Dkt. 29, 37),<sup>1</sup> and this request will not impact any deadlines other than those addressed herein.

DATED: October 18, 2023

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

/s/ Michael A. Keough  
MICHAEL A. KEOUGH  
Assistant United States Attorney

*Attorneys for Defendant Merrick Garland*

/s/ Jerry T. Yen\*  
JERRY T. YEN  
Deputy Attorney General

*Attorney for Defendant Rob Bonta*

/s/ Matthew D. Cubeiro\*  
MATTHEW D. CUBEIRO

*Attorney for Plaintiff*

*\* In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

<sup>1</sup> There was an initial request by Plaintiff and Defendant Bonta to continue the Case Management Conference until after the deadline for Defendant Garland to respond to the Complaint. Dkt. 19.

1                   **[PROPOSED] ORDER**

2                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Initial Case Management

3 Conference currently set for October 26, 2023, is reset to Thursday, January 25, 2024.

4  
5 DATE:   October 19, 2023

6                     
7                   THE HONORABLE JACQUELINE SCOTT CORLEY  
8                   United States District Judge